

August 18, 2003

Mr. Don Ingle
Tulip Tree Investments, Inc.
15679 Villoresi Way
Naples, FL 34110

Re: Registered Construction and Operation Status, **R 097-17955-00506**

Dear Mr. Ingle:

The application from Perfection Paints, received on July 18, 2003, has been reviewed. Based on the data submitted and the provisions in Sections 1 and 2 of 326 IAC 2-1, it has been determined that the following soil remediation operations, to be located at 715 East Maryland Street, Indianapolis, Indiana, is classified as registrations pursuant to air pollution permit requirements:

- (a) Two (2) soil remediation operations described as follows:
 - (1) One (1) soil vapor extractor, used to extract VOC/HAPs at a maximum of 0.991 lb/hr (equivalent to 4.5 tons per year before controls) from petroleum contaminated soil, with VOC/HAP emissions controlled by a thermal oxidizer, and
 - (2) One (1) soil vapor extractor, used to extract VOC and HAPs at a maximum of 0.134 lb/hr (equivalent to 0.57 tons per year before controls) from petroleum contaminated soil, with VOC/HAP emissions controlled by a granulated activated carbon (GAC) system.

The following conditions shall be applicable:

- (a) 326 IAC 5-1-2 (Opacity Limitations)
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
 - (1) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

This registration is the first air approval issued to this source.

Any change or modification which may increase the potential VOC emissions to twenty-five (25) tons per year or more, a single HAP emission to ten (10) tons per year or more, or a combination of HAP emissions to twenty-five (25) tons per year or more from the source covered in this registration must be approved by the Office of Environmental Services (OES) and Indiana Department of Environmental Management, Office of Air Quality (IDEM, OAQ) before such change may occur.

Sincerely,

Original Signed by John B. Chavez
John B. Chavez
Administrator

HMS

cc: File
Permits - Holly Stockrahm
Compliance - Matt Mosier
OAQ - Mindy Hahn

Indianapolis Office of Environmental Services

and

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name: Perfection Paints
Source Location: 715 East Maryland Street, Indianapolis, IN 46202
County: Marion
Registration No.: R097-17955-00506
SIC Code: Soil Remediation Operations
Permit Reviewer: Holly M. Stockrahm

The Office of Environmental Services (OES) and the Indiana Department of Environmental Management, Office of Air Quality (IDEM, OAQ) have reviewed an application from Perfection Paints relating to the construction and operation of two (2) soil remediation operations described as follows:

- (a) One (1) soil vapor extractor, used to extract VOC/HAPs at a maximum rate of 0.991 lb/hr (equivalent to 4.5 tons per year before controls) from petroleum contaminated soil, with VOC/HAP emissions controlled by a thermal oxidizer, and exhausted to Stack #1, and
- (b) One (1) soil vapor extractor, used to extract VOC and HAPs at a maximum rate of 0.134 lb/hr (equivalent to 0.57 tons per year before controls) from petroleum contaminated soil, with VOC/HAP emissions controlled by a granulated activated carbon (GAC) system, and exhausted to Stack # 2.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
#1	SVE	20	18	625	140
#2	SVE	10	4	700	Ambient

Recommendation

The staff recommends to the Administrator that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Information, unless otherwise stated, used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on July 18, 2003.

Emissions Calculations

The calculations of the potential to emit of VOC from the soil vapor extractors have been verified. The emission levels are such that VOC is less than the registration threshold (5.07 tons per year). However, the highest level of any single HAP emission for either system would be the

emission rate of methyl isobutyl ketone (MIBK) which is 0.969 lb/hr (equivalent to 4.24 tons per year). The level of the combination of HAPs from both systems is 5.07 tons per year. Both the single HAP and the combined HAPs are emitted at levels exceeding the threshold for exemption under 326 IAC 2-1.1-3, therefore, a registration will be issued.

Potential to Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

Pollutant	Potential Emissions (tons/year)
VOC	5.07
HAP combined	5.07
HAP single	4.24

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of the pollutants are greater than the levels listed in 326 IAC 2-1.1-3(d)(1). Therefore, the source is subject to the provisions of 326 IAC 2-5.1-2 (Registration).

County Attainment Status

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Marion County has been classified as attainment or unclassifiable for PM₁₀, SO₂, NO_x and CO. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	less than 1
PM ₁₀	less than 1

SO ₂	less than 1
VOC	5.07
CO	less than 1
NOx	less than 1
single HAP	4.24
HAPs	5.07

- (a) This source is a registration because it is not one of the 28 listed source categories and a single HAP is emitted at a rate of 1 ton per year or more and a combination of HAPs is emitted at a rate of 2.5 tons per year or more.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 program.

Federal Rule Applicability

There are no New Source Performance Standards (40 CFR Part 60)(326 IAC 12) applicable to this facility.

This source is not a major source of HAPs, so no National Emission Standards for Hazardous Air Pollutants for Source Categories (40 CFR Part 63) is applicable to this facility.

State Rule Applicability

326 IAC 5-1-2 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-1 (Particulate Emission Limitations for Nonattainment Areas)

The source has a PM potential to emit of less than one hundred (100) tons per year and actual emissions less than 10 tons per year, therefore, 326 IAC 6-1-2 does not apply.

326 IAC 6-3-2 (Particulate Limitations)

Soil Vapor Extraction emits a negligible amount of PM, if any, therefore, 326 IAC 6-3-2 does not apply.

326 IAC 2-4.1 (Air Toxics)

The source has a HAP potential to emit of less than ten (10) tons per year of a single HAP, and less than twenty-five (25) tons per year of a combination of HAPs, therefore, 326 IAC 2-4.1 does not apply.

326 IAC 8-1-6 (BACT)

The source has a VOC potential to emit of less than twenty-five (25) tons per year, therefore, 326 IAC 8-1-6 does not apply.

326 IAC 8

There are no other 326 IAC 8 rules applicable to this source.

Conclusion

The construction of this soil remediation operation will be subject to the conditions of the attached proposed **Registration No. 097-17955-00506**.